

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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|---|---|--------------------------|
| In re: |) | |
| |) | Chapter 11 |
| BL RESTAURANTS HOLDING, LLC, <i>et al.</i> , ¹ |) | Case No. 20- 10156 (MFW) |
| |) | |
| Debtors. |) | (Jointly Administered) |
| |) | |

NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING
FOR FEBRUARY 27, 2020, AT 2:00 P.M. (PREVAILING EASTERN TIME)²

UNCONTESTED MATTERS WITH A CERTIFICATION OF COUNSEL

1. Debtors' Motion for Entry of an Interim and Final Order (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, and (C) Maintain Existing Business Forms, and (II) Granting Related Relief [Docket No. 9; Filed 1/27/2020]

Related Documents

- A. Interim Order (I) Authorizing the Debtors to (A) Continue to Operate the Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, and (C) Maintain Existing Business Forms, and (II) Granting Related Relief [Docket No. 47; Filed 1/28/2020]
- B. Omnibus Notice of Second Day Hearing to be Held on February 27, 2020 at 2:00 P.M. [Docket No. 69; Filed 1/29/2020]
- C. Certification of Counsel [Docket No. 153; Filed 2/24/2020]
- D. Proposed Order

¹ The Debtors in these chapter 11 cases, along with the last four digits of each of the Debtors' respective federal tax identification numbers, are as follows: BL Restaurants Holding, LLC (6665); BL Restaurant Operations, LLC (7062); BL Restaurant Franchises, LLC (6923); and BL Hunt Valley, LLC (9513). The Debtors' headquarters and mailing address is: 4550 Beltway Drive, Addison, TX 75001.

² Any party who wishes to attend telephonically is required to make arrangements through CourtCall by telephone (888-882-6878) or by facsimile (866-533-2946). A copy of each pleading can be viewed on the Court's website at <https://ecf.deb.uscourts.gov> and on the website of the Debtors' notice and claims agent, Epiq Corporate Restructuring, LLC, at <https://dm.epiq11.com/BarLouie>.

Status: A Certification of Counsel has been filed. This matter is going forward unless otherwise directed by the Court.

2. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing, But Not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief [Docket No. 10; Filed 1/27/2020]

Related Documents

- A. Interim Order (I) Authorizing, But Not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief [Docket No. 48; Filed 1/28/2020]
- B. Omnibus Notice of Second Day Hearing to be Held on February 27, 2020 at 2:00 P.M. [Docket No. 69; Filed 1/29/2020]
- C. Certification of Counsel [Docket No. 154; Filed 2/24/2020]
- D. Proposed Order

Status: A Certification of Counsel has been filed. This matter is going forward unless otherwise directed by the Court.

3. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Trade Claimants, PACA/PASA Claimants, and Other Vendors, and (II) Approving the Procedures Related Thereto, and (III) Granting Related Relief [Docket No. 11; Filed 1/27/2020]

Related Documents

- A. Interim Order (I) Authorizing (A) Debtors to Pay Certain Prepetition Claims of Trade Claimants, PACA/PASA Claimants, and Other Vendors, and (B) Procedures Related Thereto, and (II) Granting Related Relief [Docket No. 49; Filed 1/28/2020]
- B. Omnibus Notice of Second Day Hearing to be Held on February 27, 2020 at 2:00 P.M. [Docket No. 69; Filed 1/29/2020]
- C. Certification of Counsel [Docket No. 155; Filed 2/24/2020]
- D. Proposed Order

Status: A Certification of Counsel has been filed. This matter is going forward unless otherwise directed by the Court.

4. Debtors' Motion for Entry of an Interim and Final Order (I) Authorizing, But Not Directing the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Docket No. 14; Filed 1/27/2020]

Related Documents:

- A. Interim Order (I) Authorizing, But Not Directing, the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief [Docket No. 52; Filed 1/28/2020]
- B. Omnibus Notice of Second Day Hearing to be Held on February 27, 2020 at 2:00 P.M. [Docket No. 69; Filed 1/29/2020]
- C. Certification of Counsel [Docket No. 157; Filed 2/24/2020]
- D. Proposed Order

Status: A Certification of Counsel has been filed. This matter is going forward unless otherwise directed by the Court.

5. Debtors' Motion for Entry of an Interim and Final Order (I) Authorizing, But Not Directing, the Debtors to (A) Pay Their Obligations Under Insurance Policies Entered into Prepetition, (B) Continue to Pay Brokerage Fees, (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, and (D) Honor the Terms of the Financing Agreements and Pay Premiums Thereunder, and (II) Granting Related Relief [Docket No. 15; Filed 1/27/2020]

Related Documents

- A. Interim Order (I) Authorizing, But Not Directing, the Debtors to (A) Pay Their Obligations Under Insurance Policies Entered into Prepetition, (B) Continue to Pay Brokerage Fees, (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, and (D) Honor the Terms of the Financing Agreements and Pay Premiums Thereunder, and (II) Granting Related Relief [Docket No. 53; Filed 1/28/2020]
- B. Omnibus Notice of Second Day Hearing to be Held on February 27, 2020 at 2:00 P.M. [Docket No. 69; Filed 1/29/2020]
- C. Certification of Counsel [Docket No. 158; Filed 2/24/2020]
- D. Proposed Order

Status: A Certification of Counsel has been filed. This matter is going forward unless otherwise directed by the Court.

6. Motion for Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket No. 110; Filed 2/6/2020]

Related Documents:

- A. Certification of Counsel [Docket No. 159; Filed 2/24/2020]
- B. Proposed Order

Status: A Certification of Counsel has been filed. This matter is going forward unless otherwise directed by the Court.

7. Application of the Debtors for Authority to Retain and Employ Epiq Corporate Restructuring, LLC as Administrative Advisor Effective as of Petition Date [Docket No. 111; Filed 2/6/2020]

Related Documents:

- A. Certification of Counsel [Docket No. 160; Filed 2/24/2020]
- B. Proposed Order

Status: A Certification of Counsel has been filed. This matter is going forward unless otherwise directed by the Court.

8. Debtors' Motion for Entry of an Order Authorizing the Debtors to Retain and Compensate Professionals Utilized in the Ordinary Course of Business [Docket No. 114; Filed 2/6/2020]

Related Documents:

- A. Certification of Counsel [Docket No. 161; Filed 2/24/2020]
- B. Proposed Order

Status: A Certification of Counsel has been filed. This matter is going forward unless otherwise directed by the Court.

9. Motion for Entry of an Order Authorizing the Debtors (I) to Employ and Retain Carl Marks Advisory Group LLC to Provide a Chief Restructuring Officer, Additional Personnel, and Financial Advisory and Restructuring-Related Services, *Nunc Pro Tunc* to the Petition Date, (II) Waiving Certain Time-Keeping Requirements Pursuant to Local Rule 2016-2(h), and (III) Granting Related Relief [Docket No. 115; Filed 2/6/2020]

Related Documents:

- A. Certification of Counsel [Docket No. 162; Filed 2/24/2020]
- B. Proposed Order

Status: A Certification of Counsel has been filed. This matter is going forward unless otherwise directed by the Court.

10. Motion of Sarah Bensman for an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)(1) [Docket No. 131; Filed 2/11/2020]

Related Documents:

- A. Certification of Counsel [Docket No. 151; Filed 2/24/2020]
- B. Proposed Order

Status: A Certification of Counsel has been filed. This matter is going forward unless otherwise directed by the Court.

UNCONTESTED MATTERS WITH A CERTIFICATE OF NO OBJECTION

11. Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief [Docket No. 12; Filed 1/27/2020]

Related Documents

- A. Interim Order (I) Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief [Docket No. 50; Filed 1/28/2020]
- B. Omnibus Notice of Second Day Hearing to be Held on February 27, 2020 at 2:00 P.M. [Docket No. 69; Filed 1/29/2020]
- C. Certificate of No Objection [Docket No. 156; Filed 2/24/2020]
- D. Proposed Order

Status: A Certificate of No Objection has been filed. This matter is going forward unless otherwise directed by the Court.

12. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain Purchase Card Program in the Ordinary Course of Business and (II) Granting Related Relief [Docket No. 77; Filed 1/31/2020]

Related Documents:

- A. Interim Order (I) Authorizing the Debtors to Maintain Purchase Card Program in the Ordinary Course of Business and (II) Granting Related Relief [Docket No. 85; Filed 2/3/2020]

- B. Notice of Hearing on Debtors' Motion for Entry of Final Order (I) Authorizing the Debtors to Maintain Purchase Card Program in the Ordinary Course of Business and (II) Granting Related Relief [Docket No. 106; Filed 2/6/2020]
- C. Certificate of No Objection [Docket No. 163; Filed 2/24/2020]
- D. Proposed Order

Status: A Certificate of No Objection was filed. This matter is going forward unless otherwise directed by the Court.

13. Debtors' Application Seeking an Order Authorizing the Retention and Employment of Klehr Harrison Harvey Branzburg LLP as Counsel for the Debtors and Debtors in Possession Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 105; Filed 2/6/2020]

Related Documents:

- A. Certificate of No Objection [Docket No. 152; Filed 2/24/2020]
- B. Proposed Order

Status: A Certificate of No Objection has been filed. This matter is going forward unless otherwise directed by the Court.

UNCONTESTED MATTERS GOING FORWARD

14. Motion by Cynthia D. Lane, Pursuant to 11 U.S.C. § 362(d), Modifying the Automatic Stay to Allow Continuation of Personal Injury Action [Docket No. 127; Filed 2/11/2020]

Response Deadline: February 18, 2020 at 4:00 p.m.

Responses Received: None

Status: This matter is going forward. The Debtors anticipate that the movant will file a certification of counsel with respect to this matter.

CONTESTED MATTERS GOING FORWARD

15. Debtors' Motion Seeking Entry of Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Authorizing the Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code, (III) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to Sections 361, 362, 363 and 364 of the Bankruptcy Code, (IV) Granting Liens and Superpriority Claims, (V) Modifying the Automatic Stay, and (VI) Scheduling a Final Hearing [Docket No. 7; Filed 1/27/2020]

Related Documents:

- A. Declaration of Vineet (“Vin”) Batra in Support of DIP Motion [Docket No. 8; Filed 1/27/2020]
- B. Interim Order (I) Authorizing Debtors to Obtain Postpetition Financing Pursuant to §364 of the Bankruptcy Code, (II) Authorizing the Use of Cash Collateral Pursuant to §363 of the Bankruptcy Code, (III) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to §§361, 362, 363, and 364 of the Bankruptcy Code, (IV) Granting Liens and Superpriority Claims, (V) Modifying Automatic Stay, and (VI) Scheduling a Final Hearing [Docket No. 59; Filed 1/28/2020]

Response Deadline: February 18, 2020 at 4:00 p.m., extended to February 18, 2020 at 4:00 p.m. solely for the Office of the U.S. Trustee and the Creditors’ Committee

Responses Received:

- A. Objection to Interim Order (I) Authorizing Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (II) Authorizing the Use Cash Collateral Pursuant to Section 363 of the Bankruptcy Code, (III) Granting Adequate Protection to the Prepetition Secured Parties Pursuant to Sections 361, 362, 363 and 364 of the Bankruptcy Code, (IV) Granting Liens and Superpriority Claims, (V) Modifying Automatic Stay, and (VI) Scheduling Final Hearing [Docket No. 88; Filed 2/3/2020]
- B. Objection of the Official Committee of Unsecured Creditors to Debtors’ Motion Seeking Entry of a Final Order Authorizing Debtors to Obtain Postpetition Financing, the Use of Cash Collateral and Granting Related Relief [Docket No. 148; Filed 2/21/2020]
- C. Informal comments of the Office of the U.S. Trustee

Status: This matter is going forward. The Debtors continue to discuss this matter with the responding parties and will inform the Court if resolution is reached prior to the hearing.

- 16. Debtors’ Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, (II) Determining Adequate Assurance of Payment for Future Utility Services, (III) Establishing Procedures for Determining Adequate Assurance of Payment, and (VI) Granting Related Relief [Docket No. 13; Filed 1/27/2020]

Related Documents

- A. Interim Order (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, (II) Determining Adequate Assurance of Payment for Future Utility Services, (III) Establishing Procedures for Determining Adequate Assurance of Payment, and (IV) Granting Related Relief [Docket No. 51; Filed 1/28/2020]
- B. Omnibus Notice of Second Day Hearing to be Held on February 27, 2020 at 2:00 P.M. [Docket No. 69; Filed 1/29/2020]

Response Deadline: February 20, 2020 at 4:00 p.m.

Responses Received:

- A. Objection of Certain Utility Companies to the Debtors' Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, (II) Determining Adequate Assurance of Payment for Future Utility Services, (III) Establishing Procedures for Determining Adequate Assurance of Payment, and (IV) Granting Related Relief [Docket No. 140; Filed 2/19/2020]

Status: This matter is going forward. The Debtors continue to discuss this matter with the responding parties and will inform the Court if resolution is reached prior to the hearing.

- 17. Debtors' Motion for Entry of an Order (A) Approving Procedures in Connection with Sale of Debtors' Assets; (B) Approving Break-Up Fee and Expense Reimbursement; (C) Scheduling Auction and Hearing to Consider Approval of Sale; (D) Approving Procedures Related to Assumption of Certain Executory Contracts and Unexpired Leases; (E) Approving Form and Manner of Notices Thereof; and (F) Granting Related Relief [Docket No. 17; Filed 1/27/2020]

Related Documents:

- A. Debtors' Motion for an Order (A) Approving Asset Purchase Agreement and Authorizing Sale of Debtors' Assets, Free and Clear of All Liens, Claims, Interests, and Encumbrances; (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Granting Related Relief [Docket No. 16; Filed 1/27/2020]
- B. Notice of Debtors' Motion for Entry of an Order (A) Approving Procedures in Connection With Sale of Debtors' Assets; (B) Approving Break-Up Fee and Expense Reimbursement; (C) Scheduling Auction and Hearing to Consider Approval of Sale; (D)

Approving Procedures Related to Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; (E) Approving Form and Manner of Notices Thereof; and (F) Granting Related Relief [Docket No. 69; Filed 1/29/2020]

Response Deadline: February 18, 2020 at 4:00 p.m., extended to February 21, 2020 at 4:00 p.m. solely for the Office of the U.S. Trustee and the Creditors' Committee

Responses Received:

- A. Objection of DLC Management Corp., Westfield, LLC and Their Landlord affiliates to Debtors Motion for Entry of an Order (a) Approving Procedures in Connection With Sale of Debtors Assets; (b) Approving Break-Up Fee and Expense Reimbursement; (c) Scheduling Auction and Hearing to Consider Approval of Sale; (d) Approving Procedures Related to Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; (e) Approving Form and Manner of Notices Thereof; and (f) Granting Related Relief [Docket No. 141; Filed 2/19/2020]
- B. Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order (I) Approving Procedures in Connection with the Sale of the Debtors' Assets; (II) Approving Bid Protection; and (III) Approving the Form of Stalking Horse Agreement [Docket No. 146; Filed 2/21/2020]
- C. United States Trustees' Objection to Debtors' Motion For Entry of an Order (A) Approving Procedures in Connection with Sale of Debtors Assets; (B) Approving Break-Up Fee and Expense Reimbursement; (C) Scheduling Auction and Hearing to Consider Approval of Sale; (D) Approving Procedures Related to Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; (E) Approving Form and Manner of Notices Thereof; and (F) Granting Related Relief (D.E. 17, Bid Procedures Motion) [Docket No. 149; Filed 2/24/2020]

Status: This matter is going forward. The Debtors continue to discuss this matter with the responding parties and will inform the Court if resolution is reached prior to the hearing.

- 18. Debtors' First Omnibus Motion for Entry of an Order (I) Authorizing the Rejection of Certain Unexpired Leases, (II) Authorizing Abandonment of Certain Personal Property, Each Effective *Nunc Pro Tunc* to the Petition Date, and (III) Granting Related Relief [Docket No. 18; Filed 1/27/2020]

Related Documents:

- A. Notice of Debtors' First Omnibus Motion for Entry of an Order (I) Authorizing the Rejection of Certain Unexpired Leases, (II) Authorizing Abandonment of Certain Personal Property, Each Effective *Nunc Pro Tunc* to the Petition Date, and (III) Granting Related Relief [Docket No. 69; Filed 1/29/2020]

Response Deadline: February 20, 2020 at 4:00 p.m.

Responses Received:

- A. Limited Objection of IMI Huntsville LLC to the Debtors' First Omnibus Motion for Entry of an Order (I) Authorizing the Rejection of Certain Unexpired Leases, (II) Authorizing Abandonment of Certain Personal Property, Each Effectively Nunc Pro Tunc to the Petition Date, and (III) Granting Related Relief [Docket No. 144; Filed 2/20/2020]

Status: This matter is going forward. The Debtors continue to discuss this matter with the responding parties and will inform the Court if resolution is reached prior to the hearing.

- 19. Debtors' Motion for Entry of an Order (A) Establishing Bar Dates for Filing Proofs of Claim, Including Claims Under 11 U.S.C. § 503(b)(9) and Administrative Expense Requests; (B) Approving the Form and Manner for Filing Proofs of Claim and Administrative Expense Requests; and (C) Approving Notice Thereof [Docket No. 112; Filed 2/6/2020]

Response Deadline: February 20, 2020 at 4:00 p.m.

Responses Received:

- A. Objection of Certain Utility Companies to the Debtors' Motion for Entry of an Order (A) Establishing Bar Dates for Filing Proofs of Claim, Including Claims Under 11 U.S.C. § 503(b)(9) and Administrative Requests; (B) Approving the Form and Manner for Filing Proofs of Claim and Administrative Expense Requests; and (C) Approving Notice Thereof [Docket No. 143; Filed 2/20/2020]

Status: This matter is going forward. The Debtors continue to discuss this matter with the responding parties and will inform the Court if resolution is reached prior to the hearing.

- 20. Debtors' Application for Entry of an Order Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code, Authorizing the Retention and Employment of Configure Partners, LLC as Investment Banker for the Debtors and Debtors in Possession, *Nunc Pro Tunc* to the

Petition Date, and Modifying Certain Time-Keeping Requirements of Local Rule 2016-2 [Docket No. 113; Filed 2/6/2020]

Response Deadline:

Responses Received:

- A. Limited Objection of the Official Committee of Unsecured Creditors to Application/Motion to Employ/Retain Configure Partner, LLC as Investment Banker for the Debtors *Nunc Pro Tunc* to the Petition Date [Docket No. 150; Filed 2/24/2020]

Status: This matter is going forward. The Debtors continue to discuss this matter with the responding parties and will inform the Court if resolution is reached prior to the hearing.

- 21. [SEALED] Motion to Authorize Debtors' Motion for Entry of an Order Authorizing and Approving the Debtors (A) Non-Insider Key Employee Retention Program, (B) Key Employee Incentive Program as Applied to Certain Insider Participants, and (C) Granting Related Relief [Docket No. 116; Filed 2/6/2020]

Related Documents

- A. Notice of Filing of Proposed Redacted Version of Debtors' Motion for Entry of an Order Authorizing and Approving the Debtors' (A) Non-Insider Key Employee Retention Program, (B) Key Employee Incentive Program as Applied to Certain Insider Participants, and (C) Granting Related Relief [Docket No. 118; Filed 2/6/2020]

Response Deadline: February 20, 2020 at 4:00 p.m.

Responses Received:

- A. Limited Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order Authorizing and Approving the Debtors (A) Non-Insider Key Employee Retention Program, (B) Key Employee Incentive Program as Applied to Certain Insider Participants, and (C) Granting Related Relief [Docket No. 173; Filed 2/25/2020]

Status: This matter is going forward. The Debtors continue to discuss this matter with the responding parties and will inform the Court if resolution is reached prior to the hearing.

- 22. Debtors' Motion to File Under Seal Certain Exhibits to the Debtors' Motion for Entry of an Order Authorizing and Approving the Debtors (A) Non-Insider Key Employee Retention Program, (B) Key Employee Incentive Program as Applied to Certain Insider Participants, and (C) Granting Related Relief [Docket No. 117; Filed 2/6/2020]

Response Deadline: February 20, 2020 at 4:00 p.m.

Responses Received:

A. Informal comments of the Office of the U.S. Trustee

Status: The Debtors anticipate submitting a revised agreed proposed form of order with respect to this matter.

Dated: February 25, 2020
Wilmington, Delaware

/s/ Domenic E. Pacitti

Domenic E. Pacitti (DE Bar No. 3989)

Michael W. Yurkewicz (DE Bar No. 4165)

Sally E. Veghte (DE Bar No. 4762)

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